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Attorneys for Plaintiffs  
 Anibal Rodriguez and Julieanna Muniz

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

ANIBAL RODRIGUEZ and JULIEANNA  
 MUNIZ individually and on behalf of all other  
 similarly situated,

Plaintiffs,

vs.

GOOGLE LLC and ALPHABET INC.

Defendants.

Case No. 3:20-cv-4688

**STIPULATION OF VOLUNTARY  
 DISMISSAL OF DEFENDANT  
 ALPHABET INC. WITHOUT  
 PREJUDICE;[PROPOSED] ORDER**

Courtroom: 3, 17th Floor  
 Judge: Hon. Richard Seeborg  
 Action Filed: July 14, 2020  
 Trial Date: Not Set

This stipulation is entered into between Plaintiffs and Alphabet Inc. (“Alphabet”), collectively referred to as the “Parties.”

WHEREAS, Plaintiffs filed their Class Action Complaint on July 14, 2020 against Google LLC (“Google”) and Alphabet, alleging constitutional and statutory violations of privacy laws;

WHEREAS, Alphabet represents that it is a holding company only and does not provide to putative class members any of the Google products or services identified in the Complaint; and

WHEREAS, Plaintiffs and Alphabet have entered into a separate agreement to toll the statute of limitations, laches, and/or any statute of repose.

WHEREFORE, pursuant to Federal Rule of Civil Procedure 41(a)(2), Plaintiffs hereby dismiss all claims, without prejudice, against Defendant Alphabet. Pursuant to agreement, the parties agree to bear their own fees and costs.

WILLKIE, FARR & GALLAGHER LLP

Date: October 13, 2020

By: /s/ Benedict Hur  
Benedict Y. Hur

Attorney for Defendants  
Google LLC and Alphabet Inc.

SUSMAN GODFREY LLP

Date: October 13, 2020

By: /s/ Amanda Bonn  
Amanda Bonn

Attorneys for Plaintiffs  
Anibal Rodriguez and Julieanna Muniz

**[PROPOSED] ORDER**

Pursuant to stipulation, and for good cause shown, the Court hereby ORDERS:

1. All claims in Rodriguez, et. al v. Google LLP, No. 3:20-cv-4688 (N.D. Cal.) against named defendant Alphabet Inc. are hereby dismissed without prejudice.

2. Plaintiffs and defendant Alphabet Inc. shall each bear their own fees and costs related hereto.

**IT IS SO ORDERED.**

Dated:

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HON. RICHARD SEEBORG  
United States District Judge

**ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), the attorney filing this document attests that he has obtained the concurrence in the filing of this document from any other signatories.

Dated: October 13, 2020

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*/s/ Benedict Hur*  
Benedict Y. Hur  
Attorney for Defendants  
Google LLC and Alphabet Inc.